

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 6/25/2021

FISHER | TAUBENFELD LLP

225 Broadway, Suite 1700  
New York, New York 10007  
**Main** 212.571.0700  
**Fax** 212.505.2001  
www.fishertaubenfeld.com

Writer's direct dial: (212) 381-0284  
Writer's email: michael@fishertaubenfeld.com

June 24, 2021

**VIA ECF**

Hon. Mary Kay Vyskocil  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Nunez et al. v. 2103 Honeywell LLC et al.  
Case No.: 21-cv-601 (MKV)

Dear Judge Vyskocil:

We represent Plaintiffs in this matter. We write to respectfully request a one-week extension of Plaintiffs' deadline to move for default judgment. The current deadline is June 28, 2021, and the new proposed deadline would be July 6, 2021. This is the second request for an extension, and there is no prejudice to Defendants, who have defaulted.

As noted in my June 6, 2021 letter, my firm had multiple deadlines earlier this month, including two summary judgment motions and an opposition to a motion for leave to appeal to the NYS Court of Appeals. These motions took up an extensive amount of firm resources, and unfortunately created a press of work in other matters, which has set my firm back further than expected. We therefore respectfully request an additional week to file the motion for a default judgment.

Thank you for your attention to the above.

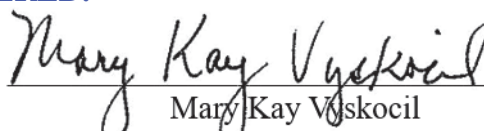
Respectfully Submitted,

-----/s/-----

Michael Taubenfeld

**GRANTED. SO ORDERED.**

Date: 6/25/2021  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge